

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

In re: **Scott Patrick Simmons**  
**Teresa Lynn Simmons**

Chapter 13

Case No.: 1-23-10440

**REQUEST TO AMEND UNCONFIRMED CHAPTER 13 PLAN**

1. This request to amend an unconfirmed Chapter 13 Plan supersedes all prior requests to amend the Plan and includes all proposed amendments. Terms not fully stated here or in the original Plan are not part of the Plan.
2. Service: A certificate of service must be filed with this request for plan amendment, together with the amended Western Wisconsin Local Form 3015-1.1.
3. Designate one of the following:
  - ☒ A copy of this proposed modification has been served on the parties (the debtor, the trustee, the United States Trustee and all creditors) as required by Fed. R. Bank. P. 3015(g); or
  - ☐ A motion requesting limited service is being filed simultaneously with the Court.
4. I request the following amendment of the Chapter 13 Plan filed with the Court:
  1. \$ 880 for 52 months;
  2. Federal tax refunds in excess of \$3500 starting in 2024 with 2023 tax returnsThe total amount of estimated payments to the trustee: \$45,760.00  
  
Ally Financial Claim secured amount \$18,416.00 at 9%.  
Pre-confirmation adequate protection payments of \$487.75/mo  
and equal monthly payments starting the first month after confirmation in the amount  
of \$458.27/mo until the secured claim plus interest is paid in full.  
  
Wage garnishment for Plan payment shall be deducted from only Debtor's wages bi-weekly.  
Ally shall retain the lien securing the 2014 Ford F150 Super Cab XLT until the earlier of the payment of the  
underlying debt determine under non-bankruptcy law or discharge under Section 1328

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All remaining terms of the original Chapter 13 plan are unaffected. In the event of a conflict between the terms of the original Plan and the terms of this amendment, the terms of this amendment will control.

WHEREFORE, each Debtor requests the Court approve this proposed amendment to the original Chapter 13 Plan.